

# **EXHIBIT**

# **25**

**Persons Interviewed:**

**Oye Oyebode (Black/Male) – Medical Technologist (approx 1 yr.) Nigerian(?)**

Witness was hired in November 2005 to work on the evening shift to replace CP. He was trained by CP along with Ben Roberts. Says the evening shift cannot compare with the day shift. Training for day shift involves different benches (6); He trained on each bench, some for 4 weeks, some for 2 weeks; Total about 2.5 months. Said day shift is very different; Reading cultures not done at night. Says Ms. Lauture was very qualified in his opinion and did a good job training him. He said that Cp was very excited about her transfer to the day shift.

**Jackie Wilson (301) 262-4777**

**Black female Medical Technologist (w/ Resp. Since August 2004)**

She only worked during the day shift

She witnessed the outburst in the lab between Stephanie and CP; Referred to Stephanie as an "Administrative Assistant" whose job was to take temperatures and go get specimens. This witness says Stephanie would not do work for CP; 1) Would not go get temperatures, 2) Wouldn't get specimens Says CP would complain to Peg and Jane; Said they met with Jo Oliver, for over an hour; Said management was very "nurturing to Stephanie"; witness stated that she personally just stopped giving her work to Stephanie because she didn't do her work; She said the Techs had to do their own temperatures because Stephanie wouldn't do it even though it was her job; witness stated that Jane had a bad temper and said to her one time "If you got anything to say to me, you say it to my face." Witness testifies that Jane and Peg needed training as supervisors; Says that Lisa Dam another Tech also complained that Stephanie wouldn't do anything

She says the "hierarchy" is Assistant, Medical Lab Technician, and Medical Technologists. Stephanie was definitely subordinate to Ms. Lauture; Basic difference between Technical (CP) and Technologist is Technician usually has an AA degree and Technologist has a four year degree; Ms. Wilson says that someone named "Kelly" refused to train Oye because she "did not feel comfortable" working with him. Ms. Wilson believed it was because he was a foreigner, and does not think that it was right for management to let her get away with that, but she did not have to train him.

**Ben Roberts (301) 604-2151**

**Black male Medical Technologist (w. Resp. for 1 yr in October) Caribbean Islander**

He was trained by Geraldine Lauture, he replaced her on the evening shift; Said she was professional and a good trainer; He has more experience than her because he has a four year degree, but felt she was very knowledgeable and did a good job with training; He explained that a "Planter" would basically do whatever test that came in; Would do "Rapid Tests – Strep, RSV – Viral tests; Witness explained that the lab was divided into different "benches": 1) Planting,

Date 2-23-09

Weigner

**DEPOSITION EXHIBIT# 10**

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2) Immunology 3) Plate Reading 4) TB 5) Bloods. Said they mainly did planting, and some immunology

Complaints by this witness - Says night shift was too much work for one person and could not believe that CP had been able do it all by herself, but she did with no complaints; He expressed this to management; he also had problems working with Stephanie and complained to Peg. Said he did not like her demeanor, she talked down to him and did not treat him with respect even though she was speaking to senior staff members; Didn't like how she talked to him

Roberts witnessed Stephanie refusing to do work for CP, example CP would ask her to put a specific number on the samples, for example- whether it was a left bronchial or right bronchial - made it easier for the techs to avoid mistakes under the hood; Stephanie could not do it and caused CP to get blamed when mistakes were made

Said Stephanie's job was "Accessioning." Roberts did not want to work with her, Roberts said that CP complained to him that she was stressed out and losing sleep over what was going on during the day shift; Roberts said that PCP was an example of tests not done at night (Something CP was accused of doing wrong on the dayshift)

**Mainaki Parikhi Medical Technologist for over 20 years (Indian?)** – This witness was extremely paranoid about talking to staff. She insisted on having the attorney present. She previously admitted to back dating information when Cp was accused of not logging temperatures properly. She is the one who supposedly "retrained" Ms. Lauture. She acknowledged that Ms. Lauture complained she had not been trained properly for the day shift. Ms. Parikhi confirmed that TB/AFB tests were not performed at night. (Something CP was written up for and management insisted she should already know how to do.) I have my doubts about the authenticity of her training checklist for Ms. Lauture. Ms. Parikhi confirmed that management "babied Stephanie." She referred to Stephanie as a teenager and commented "you know how you have to deal with teenagers." She said it required extra patience to deal with Stephanie. She referred to Stephanie as a 'secretary'

**Peg Kinch** - Ms. Kinch was one of Ms. Lauture's supervisors. Based upon this interview, it definitely appeared as though Ms. Kinch had a bias against Ms. Lauture. Although nothing was documented, she rambled on about how Ms. Lauture had made repeatedly mistakes entering data into the computer. She stated that was a part of preparing the position statement in response to Ms. Lauture's charge. She provided computer printouts which were supposed to be evidence that Ms Lauture had made mistakes entering data on the computer; however there is not mention of this in any evaluation or write up. She went on and on about the data entry. When asked, Ms. Kinch suggested that Ms. Lauture's former supervisor (Black Female) had not written her up because she was not qualified either! She even stated that she would have never

hired Ms. Lauture in the first place! (This seems pretty harsh since there is no evidence of any job performance issues until she switched to the day shift.) Ms. Kinch spoke very negatively of Ms. Lauture. This seemed very strange since Ms. Lauture's previous supervisor on the night shift (black female) had not noted any job performance problems. And, Ms. Lauture was clearly considered competent enough to train her replacements on the night shift. When asked about the problems between Stephanie and Geraldine, Ms. Kinch commented that Stephanie was in her 20's and Geraldine was older and should "be the bigger person." Kinch seemed to make excuses for Stephanie's behavior and suggested that Geraldine was the problem because she couldn't deal with it and be the bigger person.